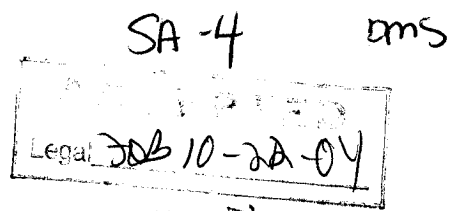


BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2004-178-E



In re:

South Carolina Electric & Gas
Company—Application for
Adjustments in the Company's
Electric Rate Schedules and Tariffs

**COLUMBIA ENERGY LLC'S
SUPPLEMENTAL ANSWERS TO FIRST
SET OF INTERROGATORIES
OF SCE&G**

Pursuant to S.C. Rules of Civil Procedure, 26 S.C. Reg. § 103-851 & 103-854, other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), and the South Carolina Rules of Civil Procedure, Columbia Energy LLC ("Columbia Energy") supplements its response to South Carolina Electric and Gas Company's ("SCE&G") First Set of Interrogatories as follows:

INTERROGATORY NO. 1: Please identify (as defined above) each and every witness or potential witness including both internal and external witnesses:

- a. Whom Columbia Energy intends to present at the hearing in this case; or
- b. To whom Columbia Energy has indicated that the witness may or should be prepared to be a witness in this proceeding.

ANSWER:

Columbia Energy's only witness will be David E. Dismukes

INTERROGATORY NO. 2: As to each witnesses identified in response to interrogatory 1(a) or (b) above, please provide a precise and detailed statement of each issue concerning which the witness may or will testify and the anticipated substance of the witnesses testimony.

ANSWER:

The anticipated substance and the issues are covered in the pre-filed testimony of Mr. Dismukes which was filed with the Commission on October 11, 2004, and served

upon SCE&G.

INTERROGATORY NO. 3: Please identify each and every accounting adjustment referenced in the pre-filed testimony of the Company's witness Carlette Walker, which Columbia Energy LLC will challenge or presently is considering challenging in this proceeding and provide a complete and detailed statement of the basis of the challenge.

ANSWER:

Objection. This interrogatory seeks information protected by the work product privilege to the extent it requests information about issues Columbia Energy "is considering challenging." Without waiving this objection, Columbia Energy refers to the pre-filed testimony of David Dismukes for issues Columbia Energy will raise in the hearing in this matter. Columbia Energy reserves the right to raise additional issues based on the further development of the record in this matter.

INTERROGATORY NO. 4: Please identify and describe in detail each and every new tariff, rate or rate change which Columbia Energy LLC will or anticipates that it will present to the Commission in this proceeding and provide a complete and detailed statement of the basis for the new tariff, rate or rate change.

ANSWER:

Objection. This interrogatory seeks information protected by the work product privilege to the extent that it seeks information concerning issues Columbia Energy "anticipates it will present." Without waiving this objection, Columbia Energy states that the issues raised by it as described in the testimony of David Dismukes, if accepted by the Commission would result in tariff and rate changes as the company's rate base would

be lower. Columbia Energy reserves the right to raise additional issues based on the further development of the record in this matter.

INTERROGATORY NO. 5: Please identify and describe in detail each and every request for relief that Columbia Energy LLC intends to make in this case and all legal and factual grounds for the request.

ANSWER: See response to interrogatories 3 and 4.

INTERROGATORY NO. 6: Please identify and specify in detail each and every document Columbia Energy, LLC intends to present into evidence in this proceeding.

ANSWER:

Objection, this interrogatory seeks information protected by the work product privilege. Without waiving this objection, Columbia Energy states that it intends to introduce the exhibits that it pre-filed in this matter. Columbia Energy reserves the right to offer additional exhibits as permitted by applicable rules pending the further development of the record in this matter.

INTERROGATORY NO. 9: Please specify each and every change that Columbia Energy, LLC will propose in any contract or agreement involving SCE & G and provide a complete and detailed statement of the basis for the change.

ANSWER: Objection, this interrogatory seeks information protected by the work product privilege. Without waiving this objection, Columbia Energy states that at the present time it is not proposing changes in any contracts. Columbia Energy reserves

the right to propose such changes pending further development of the record in this matter.

Dated this 20th day of October, 2004.

ROBINSON, MCFADDEN & MOORE, P.C.

A handwritten signature in black ink, appearing to read 'Frank R. Ellerbe, III', written over a horizontal line.

Frank R. Ellerbe, III
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Attorneys for Columbia Energy LLC

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2004-178-E

2004 OCT 22 AM 10:57
SC PUBLIC
SERVICE
COMMISSION

In re:

South Carolina Electric & Gas
Company – Application for
Adjustments in the Company's
Electric Rate Schedules and Tariffs

CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Columbia Energy LLC's Supplemental Answers to First Set of Interrogatories of SCE&G** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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Dated at Columbia, South Carolina this 22nd day of October, 2004.



Toni C. Hawkins